



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

September 7, 2022

**BY ECF**

The Honorable George B. Daniels  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: ***United States v. Willie Evans et al., S5 20 Cr. 57 (GBD)***

Dear Judge Daniels:

The Government writes, with the consent of all defense counsel for the remaining defendants in this matter, to respectfully request an adjournment of the September 14, 2022 status conference. The Government has been in ongoing plea negotiations with many of the defendants, and the Government anticipates reaching additional plea agreements with some of those defendants in the coming months. In addition, counsel for defendant Wint was recently appointed. Accordingly, the parties jointly request that the upcoming conference be adjourned for approximately 60 days. The requested adjournment will allow defendants additional time to review the discovery and to consult with their counsel concerning pretrial dispositions.

The Government additionally requests, with the consent of all defense counsel, that the Court exclude time between September 14, 2022 and the next conference date from calculation under the Speedy Trial Act. Such an exclusion would be in the interest of justice—and outweigh the best interest of the defendants and the public in a speedy trial—because it will allow the defendants and defense counsel to continue to review discovery and continue discussions on any pretrial dispositions. *See* 18 U.S.C. § 3161.

September 7, 2022  
Page 2 of 2

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/  
Rushmi Bhaskaran  
Peter J. Davis  
Assistant United States Attorneys  
Southern District of New York

cc: All Counsel of Record (by ECF)